

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
DELTA DIVISION**

**DIANE COWAN, et al.**

**PLAINTIFFS**

**and**

**UNITED STATES OF AMERICA**

**PLAINTIFF- INTERVENOR**

**v.**

**Civil Action No. 2:65-CV-00031-DMB  
(previously DC 6531-K)**

**BOLIVAR COUNTY BOARD OF  
EDUCATION, et al.**

**DEFENDANTS**

---

**SUPPLEMENT OF THE CLEVELAND SCHOOL DISTRICT TO PROPOSED PLAN**

---

The Cleveland School District (the “District”) submits this supplement to its proposed plan, [108], submitted to the Court on January 23, 2015, and in support states as follows:

1. During and following the mediation conducted in this case by Magistrate Judge Jenny Virden on May 11, 2015, the District continued evaluating Plan A and Plan B as submitted to the Court and began working to craft a new plan to specifically address many of the concerns identified by Judge Virden, the Plaintiffs, and the Government during the mediation. The new plan, “Plan C,” is a direct result of this process. Plan C is attached as Exhibit 1.

2. The District discussed Plan C with the Government on May 12, 2015, and presented a written plan on May 13, 2015, as part of the parties’ continued negotiations. To the District’s knowledge the Government, continues to analyze Plan C and negotiations are on-going.

3. The District gives notice to the Court and the parties that it intends to present testimony regarding Plan C during the upcoming hearing in this case. (In a separate pleading, the District moves the Court for a continuance).

Respectfully submitted, this 14th day of May 2015.

/s/ John S. Hooks

OF COUNSEL:

Holmes S. Adams  
Miss. Bar No. 1126  
John S. Hooks  
Miss. Bar No. 20708  
Lindsey N. Oswalt  
Miss. Bar No. 103329

Adams and Reese LLP  
1018 Highland Colony Parkway  
Suite 800  
Ridgeland, Mississippi 39157  
Telephone: (601) 355-3234  
Facsimile: (601)355-9708

and

Gerald H . Jacks  
Miss. Bar No. 3232  
Jamie F. Jacks  
Miss. Bar No. 101881

Jacks Luciano, P.A.  
Post Office Box 1209  
Cleveland, Mississippi 38732  
Telephone: (662) 843-6171  
Facsimile: (662) 843-6176

**CERTIFICATE OF SERVICE**

I, John Hooks, do hereby certify that I have this date served a true and correct copy of the above and foregoing document by electronically filing via the ECF system to:

Joseph J. Wardenski  
[Joseph.Wardenski@usdoj.gov](mailto:Joseph.Wardenski@usdoj.gov)

Renee Wohlenhaus  
[Renee.wohlenhaus@usdoj.gov](mailto:Renee.wohlenhaus@usdoj.gov)

Ellis Turnage  
[eturnage@tecinfo.com](mailto:eturnage@tecinfo.com)  
[turnagelaw@tecinfo.com](mailto:turnagelaw@tecinfo.com)

Shakti Belway  
[Shakti.belway@gmail.com](mailto:Shakti.belway@gmail.com)

This, the 14th day of May 2015.

/s/ John S. Hooks